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March 10, 2021

VIA ECF

The Honorable Alison J. Nathan  
United States District Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *In re Application of Benjamin Steinmetz for an Order to Take Discovery from Vale S.A., Vale Americas Inc., Rio Tinto plc, and Rio Tinto Limited Pursuant to 28 U.S.C. § 1782, Case No. 20-mc-00212-AJN (S.D.N.Y.) (the “Application”)*

Dear Judge Nathan:

We write on behalf of Respondents Vale S.A. and Vale Americas Inc. (collectively, “Vale”) to further apprise the Court with regard to the underlying foreign proceeding before the High Court of England and Wales (the “High Court”), captioned Vale S.A. v. Steinmetz, No. CL-2019-000723 (the “English Proceedings”), in which both Petitioner Benjamin Steinmetz (“Steinmetz”) and Respondent Vale S.A. are parties.

As we advised the Court on October 22, 2020, the parties appeared before Mr. Justice Baker of the High Court that day for a Case Management Conference (“CMC”). See ECF No. 53. At the CMC, the High Court set a deadline of March 22, 2021 for the conclusion of document productions in the English Proceedings. The parties have made subsequent appearances before and submissions to the High Court to address discovery disputes.

Hon. Alison J. Nathan, p. 2

The document disclosure process in the English Proceedings is proceeding on the timeline ordered by the High Court, and we expect that Vale will provide its disclosure as anticipated by March 22, 2021.

Respectfully submitted,

/s/ Jeffrey A. Rosenthal

Jeffrey A. Rosenthal

cc: All Counsel of Record (via ECF)